



The Commonwealth of Massachusetts

AUDITOR OF THE COMMONWEALTH

ONE ASHBURTON PLACE, ROOM 1819
BOSTON, MASSACHUSETTS 02108

A. JOSEPH DeNUCCI
AUDITOR

TEL. (617) 727-6200

NO. 2006-0655-3A

**INDEPENDENT STATE AUDITOR'S REPORT
ON THE PHYSICAL CONDITION
OF STATE-AIDED PUBLIC HOUSING UNITS
AND RESOURCES ALLOCATED FOR THE
OPERATION AND UPKEEP OF THE
FITCHBURG HOUSING AUTHORITY
JULY 1, 2003 TO JUNE 30, 2005**

**OFFICIAL AUDIT
REPORT
SEPTEMBER 24, 2007**

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In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and also obtained data from surveys and site visits to a selected, representative cross section of 66 Local Housing Authorities (LHAs) throughout the state. The Fitchburg Housing Authority was one of the authorities selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and surveyed is provided in our statewide report No. 2005-5119-3A. Our on-site visits were conducted to follow up on survey data we obtained in order to: physically observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties were maintained in accordance with public health and safety standards, and to review the state modernization funds awarded to determine whether such funds have been received and expended for their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to each LHA for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as capital renovation infrastructure costs to maximize the public housing stock across the state and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing. At the conclusion of our audit, a copy of this report was provided to the Authority. The Authority chose not to respond to the issues presented therein.

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1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

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DHCD's Property Maintenance Guide, Chapter 3(F), requires that inspections of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. The Executive Director of the Authority informed us that because funding constraints have precluded the Authority from filling the position of housing inspector, the Authority has not conducted annual dwelling unit site inspections for the last two years.

From November 28, 2005 through November 30, 2005, we inspected 21 of the 539 state-aided housing units managed by the Authority and noted 68 instances of noncompliance with Chapter II of the State Sanitary Code, including mold, mildew, and other health and safety hazards.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES **6**

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy vacant units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 301 days. Moreover, we found that as of June 30, 2005, there were 77 vacant units in the Authority's Family and Elderly Developments, and over 900 applicants on the Authority's waiting list.

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In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority indicated that on September 24, 2001 it requested funding from DHCD for its capital modernization projects. However, these requests have not been funded by DHCD. Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, if the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants may be seriously compromised.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING **10**

The Contract for Financial Assistance between the Authority and DHCD requires DHCD to subsidize the Authority to meet its expenses. Our review of the Authority's operating subsidy account indicated that a balance of \$242,074 was due from DHCD. However, a statement of amounts due the Authority provided to us by DHCD showed a balance of \$109,799. The Authority should communicate with DHCD to determine the correct amount of operating subsidy owed to ensure that this amount is properly recorded in both the Authority's and DHCD's financial statements.

5. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS **11**

Authority officials indicated that there was approximately 196,205 square feet of land available for development, which currently would accommodate 30 units of federal Section 8 single-room occupancy rentals. In addition, the Authority has approximately 35,000 square feet of land available that could accommodate approximately four units of family housing. The need for additional housing is justified, considering that there were over 900 applicants on the Authority's waiting list as of June 30, 2005.

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INTRODUCTION

Background

In accordance with Chapter 11, Section 12, of the Massachusetts General Laws, we have conducted a statewide comprehensive audit of the adequacy of the physical conditions and the resources available to provide for the operation and upkeep of the state-aided public housing authorities of the Commonwealth. To accomplish our audit, we performed work at the Department of Housing and Community Development (DHCD) and also obtained data from surveys and site visits to a selected, representative cross section of 66 Local Housing Authorities (LHAs) throughout the state. The Fitchburg Housing Authority was one of the LHAs selected to be reviewed for the period July 1, 2003 to June 30, 2005. A complete list of the LHAs visited and/or surveyed is provided in our statewide report No. 2005-5119-3A.

Our on-site visits were conducted to follow up on survey data we obtained in order to: physically observe and evaluate the physical condition of the state-regulated LHAs, review policies and procedures over unit site inspections, determine whether LHA-managed properties are maintained in accordance with public health and safety standards, and review the state modernization funds awarded to determine whether such funds have been received and expended for their intended purpose. In addition, we reviewed the adequacy of the level of funding provided to the LHAs for annual operating costs to maintain the exterior and interior of the buildings and housing units, as well as the capital renovation infrastructure costs to maximize the public housing stock across the state, and determined whether land already owned by the LHAs could be utilized to build additional affordable housing units. We also determined the number of vacant units, vacancy turnaround time, and whether any units have been taken off line and are no longer available for occupancy by qualifying families or individuals in need of housing.

Audit Scope, Objectives, and Methodology

The scope of our audit included an evaluation of management controls over dwelling unit inspections, modernization funds, and maintenance plans. Our review of management controls included those of both the Authority and DHCD. Our audit scope included an evaluation of the physical condition of the properties managed; the effect, if any, that a lack of reserves, operating and modernization funds, and maintenance and repair plans has on the physical condition of the LHAs'

state-aided housing units/projects; and the resulting effect on the LHAs' waiting lists, operating subsidies, and vacant units.

Our audit was conducted in accordance with applicable generally accepted government auditing standards for performance audits and, accordingly, included such audits tests and procedures as we considered necessary.

Our primary objective was to determine whether housing units were maintained in proper condition and in accordance with public health and safety standards (e.g., the State Sanitary Code, state and local building codes, fire codes, Board of Health regulations), and whether adequate controls were in place and in effect over site-inspection procedures and records. Our objective was to determine whether the inspections conducted were complete, accurate, up-to-date, and in compliance with applicable laws, rules, and regulations. Further, we sought to determine whether management and DHCD were conducting follow-up actions based on the results of site inspections.

Second, we sought to determine whether the LHAs were owed prior-year operating subsidies from DHCD and whether the untimely receipt of operating subsidies from DHCD may have resulted in housing units not being maintained in proper condition.

Third, in instances where the physical interior/exterior of LHA-managed properties were found to be in a state of disrepair or deteriorating condition, we sought to determine whether an insufficient allocation of operating or modernization funds from DHCD contributed to the present conditions noted and the resulting effect, if any, on the LHAs' waiting lists and vacant unit reoccupancy.

To conduct our audit we first reviewed DHCD's policies and procedures to modernize state-aided LHAs, DHCD subsidy formulas, DHCD inspection standards and guidelines, and LHA responsibilities regarding vacant units.

Second, we sent questionnaires to each LHA in the Commonwealth requesting information on the:

- *Physical condition of its managed units/projects*
- *State program units in management*
- *Off-line units*
- *Waiting lists of applicants*

- *Listing of modernization projects that have been formally requested from DHCD within the last five years, for which funding was denied*
- *Amount of funds disbursed, if any, to house tenants in hotels/motels*
- *Availability of land to build affordable units*
- *Written plans in place to maintain, repair, and upgrade its existing units*
- *Frequency of conducting inspections of its units/projects*
- *Balances, if any, of subsidies owed to the LHA by DHCD*
- *Condition Assessment Reports (CARs) submitted to DHCD*
- *LHA concerns, if any, pertaining to DHCD's current modernization process*

The information provided by the LHAs was reviewed and evaluated to assist in the selection of LHAs to be visited as part of our statewide review.

Third, we reviewed the report entitled “Protecting the Commonwealth’s Investment – Securing the Future of State-Aided Public Housing.” The report, funded through the Harvard Housing Innovations Program by the Office of Government, Community and Public Affairs, in partnership with the Citizens Housing and Planning Association, assessed the Commonwealth’s portfolio of public housing, documented the state inventory capital needs, proposed strategies to aid in its preservation, and made recommendations regarding the level of funding and the administrative and statutory changes necessary to preserve state public housing.

Fourth, we attended the Joint Legislative Committee on Housing’s public hearings on March 7, 2005 and February 27, 2006 on the “State of State Public Housing;” interviewed officials from the LHAs, the Massachusetts Chapter of the National Association of Housing and Redevelopment Officials, and DHCD officials; and reviewed various local media coverage regarding the condition of certain local public housing stock.

To determine whether state-aided programs were maintained in proper condition and safety standards, we (a) physically observed the condition of the LHAs’ units/projects by conducting inspections of selected units/projects to ensure that the units and buildings met the necessary minimum standards set forth in the State Sanitary Code, (b) obtained and reviewed the LHAs’ policies and procedures relative to unit site inspections, and (c) made inquiries with the local Boards

of Health to determine whether any citations had been issued, and if so, the LHAs' plans to address the deficiencies.

To determine whether the modernization funds received by the LHAs were being expended for the intended purposes and in compliance with laws, rules, and regulations, we obtained and reviewed the Quarterly Consolidated Capital Improvement Cost Reports, Contracts for Financial Assistance, and budget and construction contracts. In addition, we conducted inspections of the modernization work performed at each LHA to determine compliance with its work plan.

To determine whether the LHAs were receiving operating subsidies in a timely manner, we analyzed the LHAs' subsidy accounts for operating subsidies earned and received and the period of time that the payments covered. In addition, we made inquiries with each LHA's Executive Director/fee accountant, as necessary. We compared the subsidy balance due the LHAs per DHCD records to the subsidy data recorded by the LHAs.

To assess controls over waiting lists, we determined the number of applicants on the waiting list for each state program and reviewed the LHAs' waiting list for compliance with DHCD regulations.

To assess whether the LHAs were adhering to DHCD procedures for preparing and filling vacant units in a timely manner, we performed selected tests to determine whether the LHAs had uninhabitable units, the length of time the units were in this state of disrepair, and the actions taken by the LHAs to renovate the units.

At the conclusion of our audit, a copy of this report was provided to the Authority. The Authority chose not to respond to the issues presented therein.

AUDIT RESULTS

1. RESULTS OF INSPECTIONS – NONCOMPLIANCE WITH STATE SANITARY CODE

The Department of Housing and Community Development's (DHCD) Property Maintenance Guide, Chapter 3(F), requires that inspection of dwelling units be conducted annually and upon each vacancy to ensure that every dwelling unit conforms to minimum standards for safe, decent, and sanitary housing as set forth in Chapter II of the State Sanitary Code. The Fitchburg Housing Authority's Executive Director informed us that, due to funding constraints, the Authority has been precluded from filling the position of housing inspector, and has not conducted annual dwelling site inspections for state-aided housing for the last two years.

For the fiscal year ended June 30, 2005, we noted that the Authority did not prepare inspection reports for its 539 state-aided dwelling units. From November 28, 2005 through November 30, 2005, we conducted inspections of 21 units, located at the Authority's Leyte Street and Normandy Road (Veterans Housing 200-1), Canton Street and Valley Street (Elderly Housing 667-1), Daniels Street (Elderly Housing 667-2), Wallace Street (Elderly Housing 667-3), Day Street (Elderly Housing 667-5), and Almount Street and Overland Street (Family Housing 705-1) developments. Our inspection noted 68 instances of noncompliance with Chapter II of the State Sanitary Code, including mold and mildew, broken tile floors, cracks in walls, broken screens, broken window locking devices, bowed rain gutters, chimneys in severe disrepair, and other health and safety hazards. (Appendix I of our report summarizes the specific State Sanitary Code violations noted, and Appendix II includes photographs illustrating the conditions found.)

The photographs presented in Appendix II illustrate the pressing need to address the conditions noted, since postponing the necessary improvements would require greater costs at a future date and may result in the properties not conforming to minimum standards for safe, decent, and sanitary housing.

Recommendation

The Authority should ensure that annual inspections of its housing units are conducted in accordance with DHCD guidelines. In addition, the Authority should apply for funding from DHCD to address the issues noted during our inspections of the interior (dwelling units) and

exterior (buildings) of the Authority, as well as other issues that need to be addressed. Moreover, DHCD should obtain and provide sufficient funds to the Authority in a timely manner so that it may provide safe, decent, and sanitary housing for its tenants.

2. VACANT UNITS NOT REOCCUPIED WITHIN DHCD GUIDELINES

DHCD's Property Maintenance Guide indicates that housing authorities should reoccupy vacant units within 21 working days of their being vacated by a tenant. However, our review found that during the period July 1, 2003 through June 30, 2005, the Authority's average turnaround time for reoccupying vacant units was 301 days. Moreover, we found that, as of June 30, 2005, there were 77 vacant units in the Authority's Family and Elderly Developments and over 900 applicants on the Authority's waiting list.

By not ensuring that vacant units are reoccupied within DHCD's guidelines, the Authority may have lost the opportunity to earn potential rental income net of maintenance and repair costs and may have lost the opportunity, at least temporarily, to provide needy citizens with subsidized housing. The Authority indicated that there is a significant lack of demand for conventional elderly housing in the geographic areas served by the Authority. To help address this issue, DHCD approved the conversion of the Authority's 667-1 Elderly Development (48 units) into family housing, effective January 1, 2006.

Recommendation

The Authority should attempt to lessen the time taken to refurbish and reoccupy vacant units to comply with DHCD guidelines. These efforts should include requesting special funding from DHCD, hiring temporary help, and entering into mutual and cooperative agreements with surrounding Local Housing Authorities (LHAs) to assist, on a reimbursement basis, with placing these vacant units back into circulation as soon as possible. We commend the Authority for adapting its state-aided Elderly Development in accordance with demand, and urge the Authority to seek further means to address the demand for family housing. DHCD should obtain and provide the Authority with the funds necessary to fulfill their respective statutory mandates.

3. MODERNIZATION INITIATIVES NOT FUNDED

In response to our questionnaires, the Authority informed us that there is a need for modernizing its managed properties. Specifically, the Authority provided the following information regarding capital modernization projects that have been formally requested from DHCD yet remain unfunded:

<u>Date of Request</u>	<u>Program</u>	<u>Project Name</u>	<u>Purpose</u>	<u>Date Funding Denied</u>
9/24/2001	200-1	Heating/ Ventilating/Hot Water	Existing hot air heating system and hot water tanks at end of useful life. Chimney brick falling into flue pipe. Hot water vent stacks rusting through. Frequent failures.	12/4/2002
9/24/2001	667-2	Seriously deteriorated kitchens & baths	Original 39-year-old kitchens and baths at end of useful lifespan. Cabinets delaminating. No glaze left on plumbing fixtures.	12/4/2002
9/24/2001	667-2	Heating/Ventilating/ Hot Water	Original 39-year-old boilers at end of useful life. Hot water system is non-looped system requiring excess water usage to get hot water. Underground pipes in poor condition. Pipes covered with asbestos insulation.	12/4/2002
9/24/2001	667-3	Building Envelope – Windows	All-electric high-rise with original non-thermal pane/non-thermal break windows and sliding glass doors. Very drafty and difficult to operate. Wind-driven rains force water under sliders.	Funded planning grant on 12/4/02; no contract has been signed for the planning grant.

<u>Date of Request</u>	<u>Program</u>	<u>Project Name</u>	<u>Purpose</u>	<u>Date Funding Denied</u>
9/24/2001	667-3	Plumbing	Existing hot and cold water distribution system has begun to develop pinhole leaks. Very difficult to repair because pipes buried in wet wall between kitchens and baths with asbestos insulation.	12/4/2002
9/24/2001	667-3	Building/Site Security – Locks & Intercoms	Existing intercom is at end of useful life. Frequent short circuits and other issues. Failures sometimes leave main building door unlocked. Unit door locks and hardware are original and difficult to repair.	12/4/2002
9/24/2001	667-5	Electrical/Fire Safety	High rate of failure for smoke detectors and heat detectors during semi-annual testing. Devices use non-industry standard wiring. Difficult to obtain replacement parts.	Funded planning grant on 12/4/2002; no contract has been signed for the planning grant.
9/24/2001	667-5	Building/Site Security – Locks & Intercoms	Existing intercom is at end of useful life. Frequent short circuits and other issues. Failures sometimes leave main building door unlocked. Unit door locks and hardware are original mortise locksets. Very difficult to find replacement parts.	12/4/2002

<u>Date of Request</u>	<u>Program</u>	<u>Project Name</u>	<u>Purpose</u>	<u>Date Funding Denied</u>
9/24/2001	689-3	Building Envelope – Roofing	Fiberglass-based shingles have failed prematurely.	12/4/2002
9/24/2001	200-1	Building Envelope – Roofing	The remaining original roofs and some replacement roofs are leaking and have been patched multiple times. DHCD funded an earlier modernization effort, which only covered partial roof replacement.	Funded planning grant on 12/4/2002; no contract has been signed for the planning grant.

The above conditions are mainly the result of aging, use, and wear and tear and, as illustrated by photographs included in Appendix II, pose a safety hazard to tenants.

Deferring or denying the Authority's modernization needs may result in further deteriorating conditions that could render the units and buildings uninhabitable. Moreover, if the Authority does not receive funding to correct these conditions (which have been reported to DHCD), additional emergency situations may occur, and the Authority's ability to provide safe, decent, and sanitary housing for its elderly and family tenants could be seriously compromised. Lastly, deferring the modernization needs of the Authority into future years will cost the Commonwealth's taxpayers additional money due to inflation, higher wages, and other related costs.

In June 2000, Harvard University awarded a grant to a partnership of the Boston and Cambridge Housing Authorities to undertake a study of state-aided family and elderly/disabled housing. The purpose of the study was to document the state's inventory of capital needs and to make recommendations regarding the level of funding and the administrative and statutory changes necessary to give local Massachusetts housing authorities the tools to preserve and improve this important resource. The report, "Protecting the Commonwealth's Investment – Securing the Future of State Aided Public Housing," dated April 4, 2001, stated that, "Preservation of existing

housing is the fiscally prudent course of action at a time when Massachusetts faces an increased demand for affordable housing. While preservation will require additional funding, loss and replacement of the units would be more expensive in both fiscal and human terms.”

Recommendation

The Authority should continue to appeal to DHCD to provide the necessary modernization funds to remedy these issues in a timely manner.

4. STATUS OF OPERATING SUBSIDIES EARNED, RECEIVED, AND OUTSTANDING

The Contract for Financial Assistance between the Authority and the DHCD requires DHCD to subsidize the Authority to meet its expenses. During our audit, we requested and received from DHCD a statement of operating subsidy balances due and outstanding for each Local Housing Authority (LHA) of the Commonwealth as of June 30, 2005. During our field visits to the LHAs, we reviewed the subsidy records to determine whether the amounts were in agreement with balances provided by DHCD.

Our review of the Authority’s subsidy accounts indicated that \$242,074 was due from DHCD as of June 30, 2005. This balance consists of the following:

Subsidy Due the Authority for April, May, June, 2005	<u>\$325,001</u>
Balance Owed from the Authority to DHCD for the Fiscal Year Ended March 31, 2005	\$ (82,927)
Balance Due as of June 30, 2005	<u>\$242,074</u>

However, DHCD records indicated a subsidy balance due the Authority amounting to \$109,799 as of June 30, 2005.

Moreover, we noted that DHCD has not provided the Authority with timely payments of its operating subsidies. At one point in 2004, (March), the amount of subsidy DHCD owed the Authority had risen to \$661,557.54, spread out over three fiscal years (2001 - \$153,634.87, 2002 - \$460,426.02, 2003 - \$47,496.65).

Untimely payments may result in LHAs not meeting their monthly obligations in a current manner, or may cause the Authority to have to borrow funds from other programs to pay current liabilities as they become due.

Recommendation

The Authority should communicate with DHCD to determine whether the correct amount of operating subsidy due the Authority is recorded in its financial statements. Secondly, DHCD should work with each LHA to resolve any variances by obtaining quarterly financial statements from each LHA so that it can monitor and reconcile operating subsidies due to and from each LHA. Third, in order for the Authority to receive the subsidies it is entitled to on a timely and accurate basis, it is necessary that all variances are reconciled to ensure that DHCD is providing the requisite, adequate contribution.

5. AVAILABILITY OF LAND TO BUILD AFFORDABLE HOUSING UNITS

Authority officials indicated that there was approximately 196,205 square feet of land available on Canton Street and Wanoosnoc Road that could accommodate approximately 30 units of federal Section 8 single-room occupancy rentals. In addition, the Authority has approximately 35,000 square feet of land available at 110 Overland Street that could accommodate approximately four units of family housing. The need for additional housing is justified, considering that there were over 900 applicants on the Authority's waiting list as of June 30, 2005.

Without affordable housing, substantial costs may be incurred by the Commonwealth's social service programs and assistance organizations where displaced individuals turn for help. The lack of safe, decent, and affordable housing may result in families living in substandard housing, living in temporary shelters or motels, or becoming homeless. The need for affordable housing is especially critical for the elderly, whose fixed incomes and special needs limit their housing options.

Recommendation

DHCD should provide the necessary development funds to construct additional housing dwelling units to address the demand for affordable housing.

SUPPLEMENTARY INFORMATION***Authority–Managed State Properties***

The Fitchburg Housing Authority’s state-aided housing developments, the number of units, and the year each development was built is as follows:

<u>Development</u>	<u>Number of Units</u>	<u>Year Built</u>
200-1	160	1947
667-1	48	1953
667-2	56	1962
667-3	130	1973
667-4	10	1900
667-5	120	1980
705	<u>15</u>	Various
Total	<u>539</u>	

APPENDIX I
State Sanitary Code Noncompliance Noted

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
Leyte Street and Normandy Road	Front Screen Door - broken	105 CMR 410.552
<u>Veterans Development 200-1</u>	Living/Dining room – cracks in wall	105 CMR 410.500
3 Leyte Street	Bedroom #1 – mold on wall	105 CMR 410.750
	Bathroom – mold on ceiling	105 CMR 410.750
	Bedroom # 2 – mold on ceiling	105 CMR 410.750
	Basement – insulation peeling from wall	105 CMR.410.500
	Basement wall – cracks in stairway wall	105 CMR 410.500
112 Normandy Road	Living/Dining room – broken window screen	105 CMR 410.551
	Kitchen – broken tile floor	105 CMR 410.504
	Bedroom #1 – paint peeling on wall	105 CMR 410.500
	Bedroom #1 – broken window screen	105 CMR 410.551
	Bedroom # 2 – broken window screen	105 CMR 410.551
	Bedroom # 2 – paint peeling on ceiling	105 CMR 410.500
	Bedroom # 3 – paint peeling on wall	105 CMR 410.500
	Bedroom #3 – paint peeling on ceiling	105 CMR 410.500
	Basement – heating duct insulation peeling from ceiling	105 CMR 410.352
	Basement – mold on wall	105 CMR 410.750
	Basement – broken sheet rock on wall	105 CMR 410.500
125 Normandy Road	Bedroom # 1 – paint peeling on wall	105 CMR 410.500
	Basement – mold on wall	105 CMR 410.750
Leyte Street and Normandy Road	Roof -- hanging gutters	105 CMR 410.500
	Roof – chimneys in disrepair	105 CMR 410.500
	Sidewalks – cracks, holes, standing water	105 CMR 410.750

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
<u>Canton Valley Terrace- Elderly/Handicapped Development 667-1</u>		
11 Valley Street	Bathroom - broken tile floor	105 CMR 410.504
25 Valley Street	Living/Dining room – paint peeling on ceiling	105 CMR 410.500
	Kitchen - broken tile floor	105 CMR 410.504
	Bathroom – toilet seat broken	105 CMR 410.150
41 Valley Street	Living/Dining room – paint peeling on ceiling	105 CMR 410.500
	Bathroom – broken tile floor	105 CMR 410.504
	Bathroom – paint peeling on wall	105 CMR 410.500
381 Canton Street	Living/Dining room – paint peeling on ceiling	105 CMR 410.500
	Kitchen - paint peeling on wall	105 CMR 410.500
	Bedroom # 1 – paint peeling on ceiling	105 CMR 410.500
Canton Street and Valley Street	Roof – rubber roof needs to be re-caulked, hanging gutters	105 CMR 410.500
	Siding/Paint – buildings need residing	105 CMR 410.500
<u>Daniel Heights-Elderly/ Handicapped Development 667-2</u>		
16 Daniel Street	Bathroom – paint peeling on wall	105 CMR 410.500
21 Daniel Street #5	Bathroom - broken tile floor	105 CMR.410.504
25 Daniel Street #3	Living/Dining room - cracks in walls	105 CMR 410.500
<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>

	Living/Dining room - broken window locking device	105 CMR 410.480
	Kitchen – cracks in walls	105 CMR 410.500
	Kitchen – broken window locking device	105 CMR 410.480
	Bathroom - paint peeling on ceiling	105 CMR 410.500
	Bedroom - broken window locking device	105 CMR 410.480
40 Daniel Street #8	Living/Dining room - broken tile floor	105 CMR 410.504
	Kitchen - broken tile floor	105 CMR 410.504
	Bathroom - broken tile floor	105 CMR 410.504
Daniel Heights/Daniel Street	Roof – rubber roof needs to be re-caulked	105 CMR 410.500
<u>Wallace Towers Apartments- Elderly/Handicapped Development 667-3</u>		
54 Wallace Street # 210	Kitchen – paint peeling on ceiling	105 CMR 410.500
54 Wallace Street # 609	Living/Dining room - cracks in walls	105 CMR 410.500
	Living/Dining room – paint peeling on ceiling	105 CMR 410.500
	Kitchen - paint peeling on ceiling	105.CMR 410.500
54 Wallace Street #903	Kitchen - cracks in wall	105 CMR 410.500
	Bathroom - cracks in shower wall	105 CMR 410.150
<u>Durkin Apartments- Elderly/Handicapped Development (667-5)</u>		
50 Day Street #302	Living/Dining room – cracks in wall	105 CMR 410.500
50 Day Street	Roof - crack in rubber roof	105 CMR 410.500

<u>Location</u>	<u>Noncompliance</u>	<u>Regulation</u>
<u>Family Scattered Site 66 Almount St. Development</u>	Bedroom# 1 - paint peeling on wall	105 CMR 410.500

705-1C

Bedroom #2 - paint peeling on wall	105 CMR 410.500
Bedroom #3 - paint peeling on wall	105 CMR 410.500
Bathroom – mold, paint peeling on ceiling	105 CMR 410.750
	105 CMR 410.500
Sidewalks - cracks and holes	105 CMR.410.750

Family – Scattered Site
112 Overland Street
Development 705-1K

Living/Dining room – paint peeling	105 CMR 410.500
Cellar stairs in disrepair	105 CMR 410.500
Kitchen - paint peeling on ceiling	105 CMR 410.500
Bathroom - paint peeling on wall	105 CMR 410.500
Bedroom - broken window screen	105 CMR 410.551
Basement -mold on wall	105 CMR 410.750
Roof – buckling gutters in disrepair	105 CMR410.500

APPENDIX II

Photographs of Conditions Found



200-1 Development, Leyte Street and Normandy Road – Roof – Chimney in Disrepair



200-1 Development, Normandy Road – Basement – Mold on Wall



200-1 Development, Leyte Street – Mold on Bathroom Ceiling



200-1 Development, Normandy Road –Heating Duct Insulation Peeling from Basement Ceiling



667-1 Development, Valley Street – Broken Toilet Seat



667-1 Development, Valley Street – Kitchen Floor in Disrepair



705-1 Development, Overland Street – Cellar Stairs in Disrepair



667-1 Development, Canton Street – Paint Peeling on Bedroom Ceiling